

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 19- 10234 -TPA  
: (Chapter 13)  
MICHAEL GEORGE PERRY, JR. : Judge Thomas P. Agresti  
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:   
Debtor. : Doc No.  
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NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

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TO: Clerk, United States Bankruptcy Court:

PLEASE TAKE NOTICE AND BE ADVISED that the undersigned hereby appears as counsel to GREGORY D. PAMULA, in connection with the above-referenced case, pursuant to Bankruptcy Rule 9010(b); and requests, pursuant to Bankruptcy Rules 2002, 3017, 9007 and 9010, and pursuant to 11 U.S.C. §§ 102(1) and 342, that copies of all notices given or required to be given in this case and all papers served or required to be served in this case, be given to and served upon the undersigned as follows:

MICHAEL J. GRAML, ESQ.  
714 Sassafras Street  
Erie, PA 16501  
[mattorney@neo.rr.com](mailto:mattorney@neo.rr.com)

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, written or oral and whether transmitted or conveyed by mail, overnight delivery, messenger, facsimile, telephone,

electronic medium or otherwise filed or made with regard to the referenced cases and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive any (i) right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any related case, controversy or proceedings; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (iv) right to contest jurisdiction or appropriate venue in this proceeding; or (v) other rights, claims, actions, defenses, setoffs or recoupments which exist pursuant to agreement, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Respectfully submitted,

Dated: March 31, 2019

/s/ MICHAEL J. GRAML  
MICHAEL J. GRAML, ESQ.  
Attorney for GREGORY D. PAMULA  
714 Sassafraas Street  
Erie, PA 16501  
(814) 459-8288  
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[mattorney@neo.rr.com](mailto:mattorney@neo.rr.com)

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**CERTIFICATE OF SERVICE OF NOTICE OF APPEARANCE  
AND REQUEST FOR NOTICES**

I certify under penalty of perjury that I served the above captioned pleading and proposed Order of Court on the parties at the addresses specified below or on the attached list on **March 31, 2019**.

The type(s) of service made on the parties (first class mail, electronic notification, hand delivery, or another type of service) was: **First Class U.S. Mail, postage pre-paid and Electronic Notification.**

**ELECTRONIC NOTIFICATION:**

Office of the U.S. Trustee  
Liberty Center, Suite 970  
1001 Liberty Avenue  
Pittsburgh, PA 15222  
[ustpreregion03.pi.ecf@usdoj.gov](mailto:ustpreregion03.pi.ecf@usdoj.gov)

Ronda J. Winnecour, Esq.  
Office of the Chapter 13 Trustee  
USX Tower, Suite 3250  
600 Grant Street  
Pittsburgh, PA 15219  
[cmecf@chapter13trusteedpa.com](mailto:cmecf@chapter13trusteedpa.com)

Michael S. Jan Janin, Esq.  
2222 West Grandview Blvd.  
Erie, PA 16506-4508  
[mjanjanin@quinnfirm.com](mailto:mjanjanin@quinnfirm.com)

**FIRST CLASS MAIL:**

Michael George Perry, Jr.  
1140 Robison Road West  
Erie, PA 16509-4942

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification and those served by mail will be listed under the heading Service by First Class Mail.

EXECUTED ON:

March 31, 2019

/s/ MICHAEL J. GRAML  
MICHAEL J. GRAML, ESQ.  
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